

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF INDIANA**

|                                |   |                                |
|--------------------------------|---|--------------------------------|
| GECKO ROBOTICS, INC.,          | ) |                                |
|                                | ) | Case No. 2:23-cv-00229-PPS-JEM |
| Plaintiff,                     | ) |                                |
|                                | ) |                                |
| v.                             | ) |                                |
|                                | ) |                                |
| SUMMIT NDE, LLC, JUAN ROBERTO  | ) |                                |
| MENDOZA MORA and ANGEL ORTEGA, | ) |                                |
|                                | ) |                                |
| Defendants.                    | ) |                                |

**JOINT MOTION FOR ENTRY OF CONSENT INJUNCTION**

Plaintiff Gecko Robotics, Inc. and Defendants Summit NDE, LLC, Juan Roberto Mendoza Mora, and Angel Ortega (collectively, the “Parties”), by and through their undersigned counsel, jointly request that the Court enter the Consent Injunction attached hereto as Exhibit A and state as follows:

1. The Parties have reached a mutually acceptable settlement of their dispute and have executed a formal settlement agreement (the “Settlement Agreement”).
2. As a principal term of the Settlement Agreement, the Parties have agreed upon the entry of a Consent Injunction, a copy of which is attached hereto as Exhibit A.
3. On July 2, 2024, the Court entered an Order requiring the parties to file the proposed consent injunction by August 16, 2024.
4. The Parties agree on all terms of the Settlement Agreement and the proposed Consent Injunction.
5. Accordingly, the Parties respectively request that the Court enter the proposed Consent Injunction attached hereto as Exhibit A.

Respectfully submitted,

By: /s/ Fridrikh V. Shrayber

Fridrikh V. Shrayber  
Audrey K. Kwak  
Julie A. Mueller  
Dentons Cohen & Grigsby P.C.  
625 Liberty Avenue, 5th Floor  
Pittsburgh, PA 15222-3152  
Telephone: (412) 297-4900  
fred.shrayber@dentons.com  
audrey.kwak@dentons.com  
julie.mueller@dentons.com

*Attorneys for Plaintiff GECKO  
ROBOTICS, INC.*

Respectfully submitted,

By: /s/ C. Anthony Ashford

C. Anthony Ashford  
Ashford Law Group, PC  
332 W. 806 N.  
Valparaiso, IN 46385  
Telephone: (219) 728-5210  
cashfordlaw1@gmail.com

Guy S. DiMartino  
Guy DiMartino Law, PC  
1000 Washington Street  
Michigan City, IN 46360  
Telephone: (219) 690-8997  
gsd@gsdimartino.com

*Attorneys for Defendant SUMMIT NDE, LLC*

By: /s/ Paul B. Poracky

Paul B. Poracky  
Koransky, Bouwer & Poracky, P.C.  
425 Joliet Street, Suite 425  
Dyer, IN 46311  
Telephone: (219) 865-6700  
pporacky@kblegal.net

Date: July 16, 2024

*Attorneys for Defendants JUAN ROBERTO  
MENDOZA MORA and ANGEL ORTEGA*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 16th day of July, 2024, a true copy of the foregoing document was served upon all counsel of record via CM/ECF.

/s/ Fridrikh V. Shrayber